BAKER & HOSTETLER LLP

45 Rockefeller Plaza New York, NY 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201 David J. Sheehan

Oren J. Warshavsky

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, et al.

Defendants.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 09-01364 (SMB)

CERTIFICATE OF NO OBJECTION TO TRUSTEE'S MOTION FOR THE ISSUANCE OF LETTER OF REQUEST

Irving H. Picard (the "Trustee"), as trustee for the liquidation of Bernard L. Madoff
Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–*lll*,
and the substantively consolidated Chapter 7 Estate of Bernard L. Madoff, by and through his
undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and
respectfully represents:

- 1. On November 17, 2020, pursuant to 28 U.S.C. § 1781, the Trustee filed the Motion for the Issuance of Letter of Request for International Judicial Assistance to The Senior Master, for the attention of the Foreign Press Section, Room E16 of the Royal Courts of Justice, Strand, London WC2A 2LL, for the examination of United Kingdom resident, Mr. Rene Riefler, (the "Motion") (Adv. Pro. No. 09-01364 (SMB), ECF 651).
- 2. The deadline for filing objections to the Motion expired on December 1, 2020. A hearing on the Motion has been scheduled for December 16, 2020 at 10:00 a.m.
- 3. Notice of the Motion was timely provided by U.S. Mail postage prepaid or email to defendants in the adversary proceeding and all parties that filed a notice of appearance in this case, pursuant to the Order Establishing Notice Procedures (ECF No. 4560).
- 4. Counsel has reviewed the Court's docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, or responsive pleading with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.
- 5. An electronic copy of the proposed order (the "Order"), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: December 4, 2020 New York, New York

Respectfully submitted,

/s/ Oren J. Warshavsky

Baker & Hostetler LLP

45 Rockefeller Plaza New York, New York 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Oren J. Warshavsky

Email: owarshavsky@bakerlaw.com

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